


FILED
OCT 17 2018
CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**JOSEPH GONZALEZ (1),
CHRISTOPHER LEON (2), and
BRANDON MORRIS (3).**

Defendants.

CRIMINAL NO. SA-18-CR-435(1,2,3)-XR

SUPERSEDING INDICTMENT

Count 1: 21 U.S.C. §§ 846, 841(b)(1)(A):
Conspiracy to possess 500g mixture
containing methamphetamine

Count 2: 21 U.S.C. §841(b)(1)(A)
possess 500g mixture containing
methamphetamine

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846, 841(b)(1)(A)]

That on or about, June 4, 2018, in the Western District of Texas and elsewhere, Defendants,

**JOSEPH GONZALEZ (1),
CHRISTOPHER LEON (2), and,
BRANDON MORRIS (3).**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others known and unknown to the Grand Jury, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
JOSEPH GONZALEZ (1),	500 grams or more of mixture containing methamphetamine
CHRISTOPHER LEON (2)	500 grams or more of mixture containing methamphetamine
BRANDON MORRIS (3).	500 grams or more of mixture containing methamphetamine

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

That on or about June 4, 2018, in the Western District of Texas and elsewhere, Defendants,

**JOSEPH GONZALEZ (1),
CHRISTOPHER LEON (2), and,
BRANDON MORRIS (3).**

did unlawfully, knowingly, and intentionally possess with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

I.

Drug Violations and Forfeiture Statutes

[Title 21 U.S.C. §§ 846, 841(a)(1) & (b)(1)(A), subject to forfeiture pursuant to Title 21 U.S.C. §§ 853(a)(1) and (2). See Fed. R. Crim. P. 32.2]

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property

described below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 21 U.S.C. §§
853(a)(1) and (2), which state:

Title 21 USC § 853. Criminal forfeitures

(a) Property subject to criminal forfeiture

Any person convicted of a violation of this subchapter or subchapter II of this chapter punishable by imprisonment for more than one year shall forfeit to the United States, irrespective of any provision of State law –

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation;
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

II.

Personal Property

This Notice of Demand for Forfeiture includes but is not limited to the property described below:

\$3,450.00, More or Less, in United States Currency.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JOHN F. BASH

United States Attorney

BY:



MATTHEW LATHROP

Assistant United States Attorney